

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

AGIS SOFTWARE DEVELOPMENT LLC

Plaintiff,

v.

GOOGLE LLC

Defendant.

CIVIL ACTION NO. 2:19-cv-00361-JRG

**Filed Under Seal**

**DECLARATION OF JOE DATA**

I, Joe Data, declare and state as follows:

1. I am the Program Manager for Street View at Google LLC. ("Google"). I work at Google's offices in Mountain View, California. I have been a Google employee since May 2013.
2. I provide this declaration in support of Google's motion to dismiss for improper venue. I submit this declaration based on my personal knowledge and review of relevant company records.
3. Google Street View provides panoramic images along streets displayed in Google Maps. The images are captured using a fleet of Street View cars, which travel throughout the country.

[REDACTED]

[REDACTED]

[REDACTED]

4. Street View cars from Google's fleet were driven in the Eastern District of Texas by temporary workers (who were not Google employees) in certain months of 2019. Those same cars were also driven outside this District and in other states in those same months and other months.

throughout the year. None of these cars were permanently stored in the Eastern District of Texas. No Google employees performed repairs on any of these cars in the Eastern District of Texas.

5. Street View Trekker backpacks provide panoramic images of particular sites throughout the country, usually inaccessible to cars. Street View Trekker backpacks were used in the Eastern District of Texas for seven days spread across January, April, July, and November in 2019. Those backpacks were also used in different locations outside this District and in other states throughout the year.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed on February 12, 2020, in Mountain View, California.

\_\_\_\_\_  
Joe Data

